



The New York Times
Company

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March 25, 2022

VIA ECF

The Honorable J. Paul Oetken
United States District Court
Southern District of New York
40 Foley Square
New York, NY 10007

Re: *The New York Times Company v. United States Department of
State*, No. 22-cv-00791

Dear Judge Oetken:

I am counsel for plaintiff The New York Times Company (“The Times”) in the above-captioned action brought pursuant to the Freedom of Information Act (“FOIA”), 5 U.S.C. § 552. I submit this letter on behalf of all parties pursuant to the Court’s March 15, 2022 Order (Dkt. No. 10).

The parties have met and conferred concerning a schedule for further proceedings in this matter. The State Department has started identifying potentially responsive records and has agreed to begin processing records for production as it continues to identify the remaining potentially responsive records. The State Department will make a good faith effort to process 300 pages for its first production and produce any responsive records by or on April 28, 2022. Because the searches are still in process, the parties do not yet know the total universe of records potentially responsive to the requests at issue. In light of this, the parties respectfully request that the Court permit the parties to submit a further status report on April 29, 2022, advising the Court of the parties’ progress. By the next status letter, the State Department will also make best efforts to provide a page count for the total number of potentially responsive records.

We thank the Court for its consideration of this submission.

Respectfully submitted,

/s/ David McCraw

David McCraw

cc: All counsel of record (via ECF)